

EXHIBIT D



RE: Time for M&C on 11/12

From Alexandra Sadinsky <ASadinsky@elsberglaw.com>

Date Tue 11/12/2024 12:22 PM

To Kaitlin P. Sheehan <kaitlinsheehan@quinnmanuel.com>; Brian Campbell <BCampbell@elsberglaw.com>; Chiang, May <May.Chiang@dechert.com>; Levander, Andrew <andrew.levander@dechert.com>; Rollo Baker <rbaker@elsberglaw.com>; Strong, Ryan <Ryan.Strong@dechert.com>; Roberts, Daniel <Daniel.Roberts@dechert.com>; Vivek Tata <vtata@elsberglaw.com>; Park, Hayoung <Hayoung.Park@dechert.com>; Molly O'Keefe <mokeefe@elsberglaw.com>; Davy Perlman <dperlman@elsberglaw.com>; Shams Hirji <SHirji@elsberglaw.com>; Black, Martin <martin.black@dechert.com>; Kateryna Shokalo <kshokalo@elsberglaw.com>

Cc QE Jane Street <qejanestreet@quinnmanuel.com>

[EXTERNAL EMAIL from asadinsky@elsberglaw.com]

Counsel,

We disagree with your interpretation of the Court's statements at the July 19 hearing and in the July 22 order, which were about document discovery, not deposition discovery. These topics are all clearly relevant, and go directly—among other things—to Jane Street's bad faith in bringing the lawsuit (as demonstrated by numerous internal documents). Please explain your position as to why you believe questioning Jane Street employees about Jane Street's business and employment practices is improper, and provide your authority in advance of our meet-and-confer.

Defendants reserve all rights and waive none.

Thanks,
Alex

Alexandra Sadinsky

Associate [\[Bio\]](#)

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212.597.2636 (o)

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(she/her/hers)

From: Kaitlin P. Sheehan <kaitlinsheehan@quinnmanuel.com>

Sent: Tuesday, November 12, 2024 12:06 PM

To: Brian Campbell <BCampbell@elsberglaw.com>; Chiang, May <May.Chiang@dechert.com>; Alexandra Sadinsky <ASadinsky@elsberglaw.com>; Levander, Andrew <andrew.levander@dechert.com>; Rollo Baker <rbaker@elsberglaw.com>; Strong, Ryan <Ryan.Strong@dechert.com>; Roberts, Daniel <Daniel.Roberts@dechert.com>; Vivek Tata <vtata@elsberglaw.com>; Park, Hayoung <Hayoung.Park@dechert.com>; Molly O'Keefe <mokeefe@elsberglaw.com>; Davy Perlman <dperlman@elsberglaw.com>; Shams Hirji <SHirji@elsberglaw.com>; Black, Martin <martin.black@dechert.com>; Kateryna Shokalo <kshokalo@elsberglaw.com>

Cc: QE Jane Street <qejanestreet@quinnmanuel.com>

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Counsel,

For the sake of clarity, during today's M&C call we plan to specifically discuss the following topics that were listed in Defendants' 30(b)(6) notice and Jane Street's objection to those topics. In addition, we want to confirm whether Defendants intend to ask (some or all) of Jane Street's fact witnesses about these topics—in their individual capacity—during their depositions.

- **Topic 3:** Jane Street's [REDACTED] India options trading.
- **Topic 17:** compensation and retention policies, and performance incentives and non-compete agreements, for *all* Jane Street employees.
- **Topics 18 and 25:** compensation, ratings, reviews, and performance evaluations for *all* Jane Street employees, and compensation in particular for nine Jane Street personnel.
- **Topics 23 and 24:** departures or potential departure by *any* Jane Street trader or manager and any adverse action taken or considered for *any* former employee.

Absent agreement that Defendants will not question any of Jane Street's fact or 30(b)(6) witnesses about these topics—except as expressly permitted by the Court's statements during the July 19 hearing and July 22 Order—we plan to file a motion for protective order today.

Thanks,
Kaitlin

From: Kaitlin P. Sheehan

Sent: Tuesday, November 12, 2024 1:14 AM

To: Brian Campbell <BCampbell@elsberglaw.com>; Chiang, May <May.Chiang@dechert.com>; Alexandra Sadinsky <ASadinsky@elsberglaw.com>; Levander, Andrew <andrew.levander@dechert.com>; Rollo Baker <rbaker@elsberglaw.com>; Strong, Ryan <Ryan.Strong@dechert.com>; Roberts, Daniel <Daniel.Roberts@dechert.com>; Vivek Tata <vtata@elsberglaw.com>; Park, Hayoung <Hayoung.Park@dechert.com>; Molly O'Keefe <mokeefe@elsberglaw.com>; Davy Perlman <dperlman@elsberglaw.com>; Shams Hirji <SHirji@elsberglaw.com>; Black, Martin <martin.black@dechert.com>; Kateryna Shokalo <kshokalo@elsberglaw.com>

Cc: QE Jane Street <qejanestreet@quinnmanuel.com>

Subject: RE: Time for M&C on 11/12

Thanks. I circulated a calendar invite for tomorrow at 2 pm ET.

Thanks,
Kaitlin

From: Brian Campbell <BCampbell@elsberglaw.com>

Sent: Monday, November 11, 2024 10:47 PM

To: Chiang, May <May.Chiang@dechert.com>; Kaitlin P. Sheehan <kaitlinsheehan@quinnmanuel.com>; Alexandra Sadinsky <ASadinsky@elsberglaw.com>; Levander, Andrew <andrew.levander@dechert.com>; Rollo Baker <rbaker@elsberglaw.com>; Strong, Ryan <Ryan.Strong@dechert.com>; Roberts, Daniel <Daniel.Roberts@dechert.com>; Vivek Tata <vtata@elsberglaw.com>; Park, Hayoung <Hayoung.Park@dechert.com>; Molly O'Keefe <mokeefe@elsberglaw.com>; Davy Perlman <dperlman@elsberglaw.com>

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[EXTERNAL EMAIL from bcampbell@elsberglaw.com]

EBM can be available after 2pm tomorrow.

Thanks,

Brian

From: Chiang, May <May.Chiang@dechert.com>

Sent: Monday, November 11, 2024 8:11 PM

To: Kaitlin P. Sheehan <kaitlinsheehan@quinnmanuel.com>; Brian Campbell <BCampbell@elsberglaw.com>; Alexandra Sadinsky <ASadinsky@elsberglaw.com>; Levander, Andrew <andrew.levander@dechert.com>; Rollo Baker <rbaker@elsberglaw.com>; Strong, Ryan <Ryan.Strong@dechert.com>; Roberts, Daniel <Daniel.Roberts@dechert.com>; Vivek Tata <vtata@elsberglaw.com>; Park, Hayoung <Hayoung.Park@dechert.com>; Molly O'Keefe <mokeefe@elsberglaw.com>; Davy Perlman <dperlman@elsberglaw.com>; Shams Hirji <SHirji@elsberglaw.com>; Black, Martin <martin.black@dechert.com>; Kateryna Shokalo <kshokalo@elsberglaw.com>

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Subject: RE: Time for M&C on 11/12

I believe Brian sent an email earlier today asking for a meet and confer tomorrow afternoon. We should discuss the 30(b)(6) issues all together. Counsel for Millennium is available tomorrow 12-3 pm ET or 4-5 pm ET.

May Chiang

Partner

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From: Kaitlin P. Sheehan <kaitlinsheehan@quinnmanuel.com>

Sent: Monday, November 11, 2024 7:54 PM

To: Brian Campbell <BCampbell@elsberglaw.com>; Alexandra Sadinsky <ASadinsky@elsberglaw.com>; Chiang, May <May.Chiang@dechert.com>; Levander, Andrew <andrew.levander@dechert.com>; Rollo Baker <rbaker@elsberglaw.com>; Strong, Ryan <Ryan.Strong@dechert.com>; Roberts, Daniel <Daniel.Roberts@dechert.com>; Vivek Tata <vtata@elsberglaw.com>; Park, Hayoung <Hayoung.Park@dechert.com>; Molly O'Keefe <mokeefe@elsberglaw.com>; Davy Perlman <dperlman@elsberglaw.com>; Shams Hirji <SHirji@elsberglaw.com>; Black, Martin <martin.black@dechert.com>; Kateryna Shokalo <kshokalo@elsberglaw.com>

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[EXTERNAL EMAIL]

Counsel,

As discussed last week during our M&C on Thursday afternoon and conveyed in emails on Friday, November 8 at 8 pm ET and Sunday, November 10 at 6:46 pm ET, there are numerous items we need to meet and confer about related to upcoming depositions, including but not limited to the process for 30(b)(6) depositions and the scope of Defendants' 30(b)(6) deposition topics and related 30(b)(1) issues.

Please let me know if you are available tomorrow AM to discuss. We are available after 10 am ET.

Thanks,
Kaitlin

This e-mail is from Dechert LLP, a law firm, and may contain information that is confidential or privileged. If you are not the intended recipient, do not read, copy or distribute the e-mail or any attachments. Instead, please notify the sender and delete the e-mail and any attachments.
Thank you.